

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

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§
§

v.

AMIR AQEEL,
Defendant

§ CASE NO.: 4:20-cr-583

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES AMIR AQEEL, by and through his respective undersigned counsel, and bring this Unopposed Motion for Continuance, and in support hereof, Defendant would show the court the following:

1. A telephone hearing has been set on Defendant's Motion to Amend or Reconsider Order of Detention Pending Trial and Request to set Bail. The hearing is scheduled for Wednesday, April 21, 2021 at 2:00 P.M.
2. The government's supplemental response materials that Defense Counsel needs to review in order to provide effective assistance. This includes references to recordings in Urdu, that have not been officially translated, nor turned over to Defense Counsel.
3. Counsel for Defendant has conferred with Counsel for the United States in an email thread and have agreed not to oppose a continuance if this Court would so allow.
4. Pursuant to the Speedy Trial Act, §§ 18 U.S.C. 3161(h)(7)(A) and (B)(iv), defense counsel requests the court to enter an order granting a continuance on the basis that the ends of justice will be served by allowing defense counsel the reasonable time necessary to review discovery and investigate possible defenses to the allegations.

5. This Motion is not made for purposes of delay, but so that justice might be served.
6. WHEREFORE, PREMISES CONSIDERED, Defendant respectfully pray that this Honorable Court will grant this Motion for Continuance thereby continuing the telephonic hearing scheduled for Wednesday, April 21, 2021 at 2:00 p.m.

Respectfully submitted,

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ATTORNEYS FOR AMIR AQEEL

CERTIFICATE OF CONFERENCE

I hereby certify that Defense Counsel and all Counsel for the United States have conferred in an email thread regarding the matters described above and received confirmation that the government does not oppose a continuance of the Wednesday April 21, 2021 hearing setting, as described above.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of a true and correct copy of the foregoing has been made by electronic means or U.S. mail, on Tuesday, April 20, 2021 to all attorneys of record.

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ORDER

Pursuant to the Speedy Trial Act, 18 U.S.C. Section 3161(h)(7)(A), the Court finds that the ends of justice will be served by allowing the defendants additional time in which to prepare this case and these findings outweigh the best interest of the public and the defendants in a speedy trial. The Court's basis for said finding is that the failure to grant a continuance in this case would deny counsel for the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. §3161(h)(B)(iv).

IT IS HEREBY ORDERED that Defendants' Unopposed Motion for Continuance is hereby GRANTED. Defendant's Hearing will now be held on _____, 2021.

SIGNED AND ENTERED, on this the _____ day of _____, 20__.

THE HONORABLE ANDREW S. HANEN
UNITED STATES DISTRICT COURT